



AMERICAN COLLEGE OF  
OCCUPATIONAL AND  
ENVIRONMENTAL MEDICINE

May 31, 2007

Lynn Woolsey  
Chairwoman  
Subcommittee on Workforce Protections  
Committee on Education and Labor  
U. S. House of Representatives  
Washington, DC 20515

George Miller  
Chairman  
Committee on Education and Labor  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairwoman Woolsey and Chairman Miller:

I am writing on behalf of the American College of Occupational and Environmental Medicine (ACOEM) regarding the need for OSHA to issue an Interim Final Standard regulating worker exposure to diacetyl. Recent NIOSH investigation has determined that diacetyl, a flavoring agent used in microwave popcorn and many other foods, can cause debilitating lung disease among exposed workers.

Recent scientific evidence is compelling that diacetyl and perhaps other flavoring agents pose a serious health hazard to exposed workers. ACOEM endorses the urgent need to establish a standard to limit exposures, and implement medical surveillance of exposed workers under professional guidance. ACOEM believes that OSHA should act without further delay to address this urgent matter through an Interim Final Standard. Should OSHA not proceed promptly, ACOEM supports the need for Congress to act specifically in this regard.

A standard should reflect the urgent need to better define toxic thresholds and exposure/physiologic change; and include a medical surveillance component for systematic acquisition and on-going analysis of symptoms and monitoring of objective indices of early pulmonary impairment for workers at risk of bronchiolitis obliterans (BO).

ACOEM is an international medical specialty society which represents more than 5,000 physicians specializing in the field of occupational and environmental medicine (OEM). Founded in 1916, ACOEM is the largest medical society in the United States that is dedicated to promoting the health of workers through preventive medicine, clinical care, research, and education.

Thank you for your consideration of these comments.

Sincerely,

Robert K. McLellan, MD, MPH, FACOEM  
President